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RS

February 25, 2004

Surface Transportation Board
Case Control Unit
1925 K Street, NW
Washington, D.C. 20423-0001

received
2/25/04

Attention: Rini Ghosh

Re: Finance Docket No. 34284

Dear Ms. Ghosh:

Thank you for sending your Notice of Intent to Prepare an Environmental Impact Statement on the above proposed FD 34284. In response, I am submitting the following to be considered in the formal scoping process.

I believe Vulcan's proposed quarry and proposed SGR rail line, regardless of where the railroad is constructed, are connected actions, and should be studied in the same Environmental Impact Statement. The study should include direct impacts and alternatives to both projects, including no quarry and no rail line at all.

First, I would like to address the problem the proposed rail line presents regarding crossings of the state and county roads. Vulcan/SGR attorney, David Coburn, states that this area is sparsely populated. That is not true. Enclosed is a map showing most of the Residences in the Quihi Area. Not all the residences have been notated at this time. These residents use FM 2676, as well as CR 4516, to go east to San Antonio, and FM 2676 to go west to Hondo. There is no other way. Traffic from the east end of FM 2676 - Rio Medina - also use FM 2676 to go to points west to CR 173 and Hondo. Traffic from the western areas of the county also use FM 2676 to travel to the east, bypassing Castroville. Of course, there are also school buses and other public service traffic. Agricultural suppliers and grain elevators at each end of FM 2676 are the destination for much of the agricultural traffic. Agricultural traffic also consists of tractors and farm machinery moving between fields along FM 2676 and CR 4516. The *type* of traffic here is far more important than the *volume*. This is the traffic at the present time, not considering the additional traffic that would be brought in by future quarry development. Vulcan has projected 125 gravel trucks making round trips to the quarry, as well as 150 workers commuting to and from the quarry site, every day. There would also be **additional** traffic generated by all the industrial businesses that Vulcan hopes to bring into the area. There would be almost continual road repair of FM 2676, because the gravel trucks' loaded weight of 78,000 lbs is heavier than FM 2676 was built to handle, and such lane closures would further impede the traffic. The EIS must consider not only the maintenance costs, but costs of taking out grade-level crossings, and costs of replacement with separations for all of the routes (unless grade separation were constructed at the beginning). If this quarry/rail line is permitted, from a safety standpoint, grade separation of the rail line and highway traffic is necessary for all this traffic to move freely through FM 2676 and CR 4516, and it should be done **initially**, not when people start getting killed.

Clearly, Vulcan officials did not do their homework before starting their plans for this project. The floodplains, wetlands, traffic, historic features (visible buildings and sites, and buried artifacts) and, most importantly, safety for people and property were not considered.

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Enclosed is a Historical Sites map outlining the area of the rock Alsatian homes, schools, churches and cemeteries dating back to the mid 1800's. Encircled is the point of the proposed and alternate rail lines crossing CR 365 in this district, through the floodplain. CR 365 was originally known as Upper Quihi Road at the time of the early settlers. This road followed the Quihi creek, connecting the settlers homes to each other. Trains crossing CR 365 would divide this district. The aesthetics would be destroyed by mile-long uncovered gondola train cars loaded with crushed limestone, with their associated noise, dust and vibration, crossing this historic area four times daily. Further, if the crossing were at grade level, the accompanying berms would exacerbate the flooding that occurs *regularly* at this low point in CR 365. If the crossing were elevated, the train would be even more visible. There is nothing charming about 100 dusty gondola cars of crushed limestone. Crossing at this location, whether grade level or elevated, is completely undesirable aesthetically. The EIS should include this in its study.

CR 4516, which connects Quihi to Castroville, is a historic road. In 1846, US Army General John Ellis Wool used it to march from San Antonio to the Rio Grande. The only part of General Wool's road remaining is that stretch from Castroville to Quihi which is CR 4516. Prior to that, Mexican General Adrian Woll (born in France, fled to Mexico in 1816) used this same route to invade Texas in 1842. Their names were similar. Again, the only part remaining of that General Woll's road is the portion from Quihi to a point somewhere just east of where CR 4643 joins CR 4516. At that point Mexican General Woll's route departed from CR 4516 and headed northeast toward San Antonio. This road was used later as a smuggler's road during the late Spanish-Mexican period. CR 4516 has curves and hills, making the crossing of this road by a railroad very dangerous. There is not much visibility and stopping distance. Grade separation is a must on CR 4516. Cherry Creek crosses CR 4516 several times, and there are various ponds and wetlands present. There are artesian springs along Quihi creek before it reaches historic Quihi lake, in the area of the proposed and alternate routes. See enclosed copy of infrared map. Vulcan/SGR proposes to cross CR 4516 at one of the Cherry Creek crossings. At the present time, simply maintaining the road surface of CR 4516 for vehicular traffic is very difficult because of the unstable condition of the roadbed. The railroad roadbed would be even more difficult because of the weight of the rail traffic. Obviously, much study for the EIS needs to be done here, detailing construction and maintenance of any rail crossing.

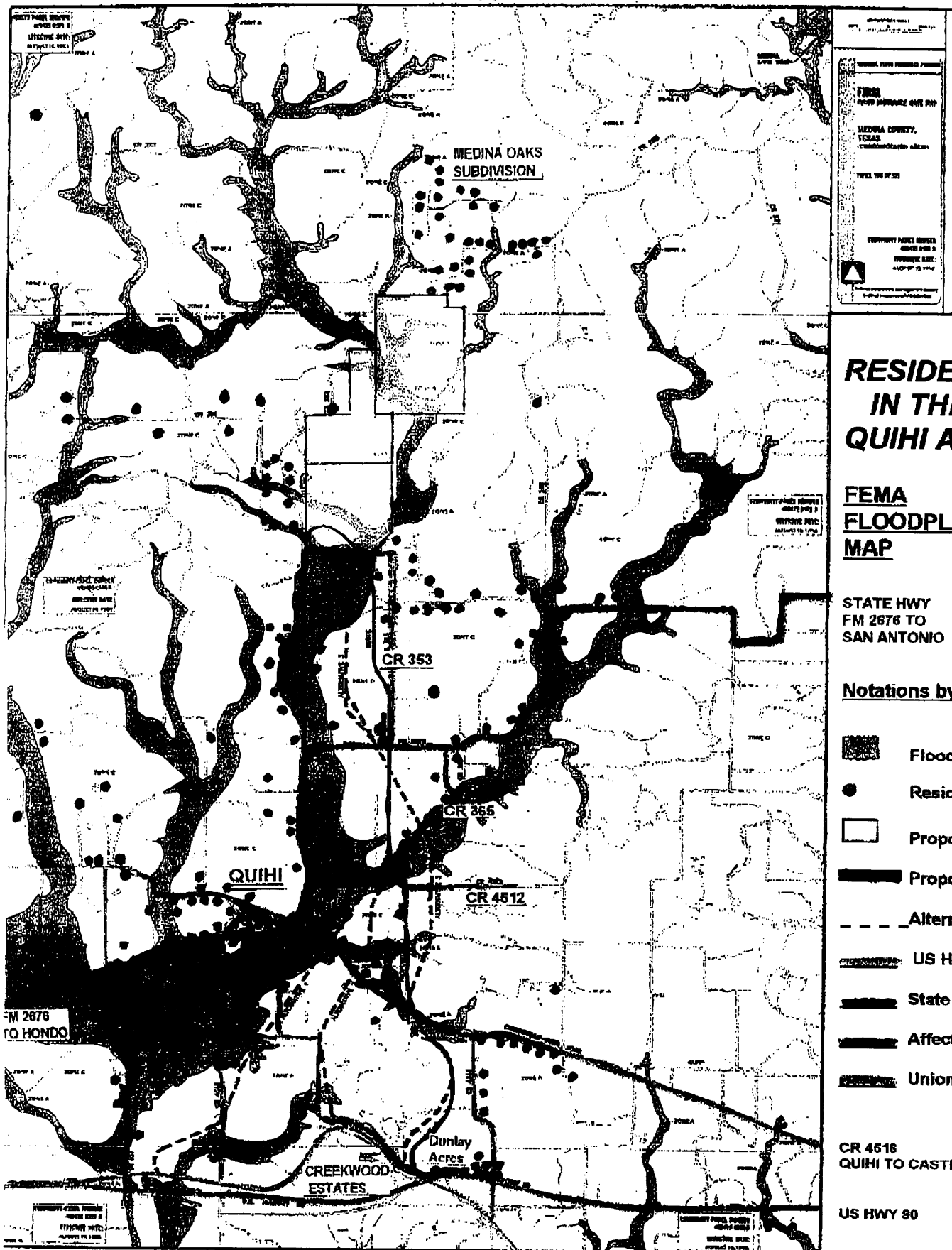
Another alternative route must be found outside of the Quihi floodplain. Moreover, all issues related to the problems the quarry/railroad presents must be resolved before the project is started. If this is not possible, the quarry/railroad project should be abandoned.

Respectfully,

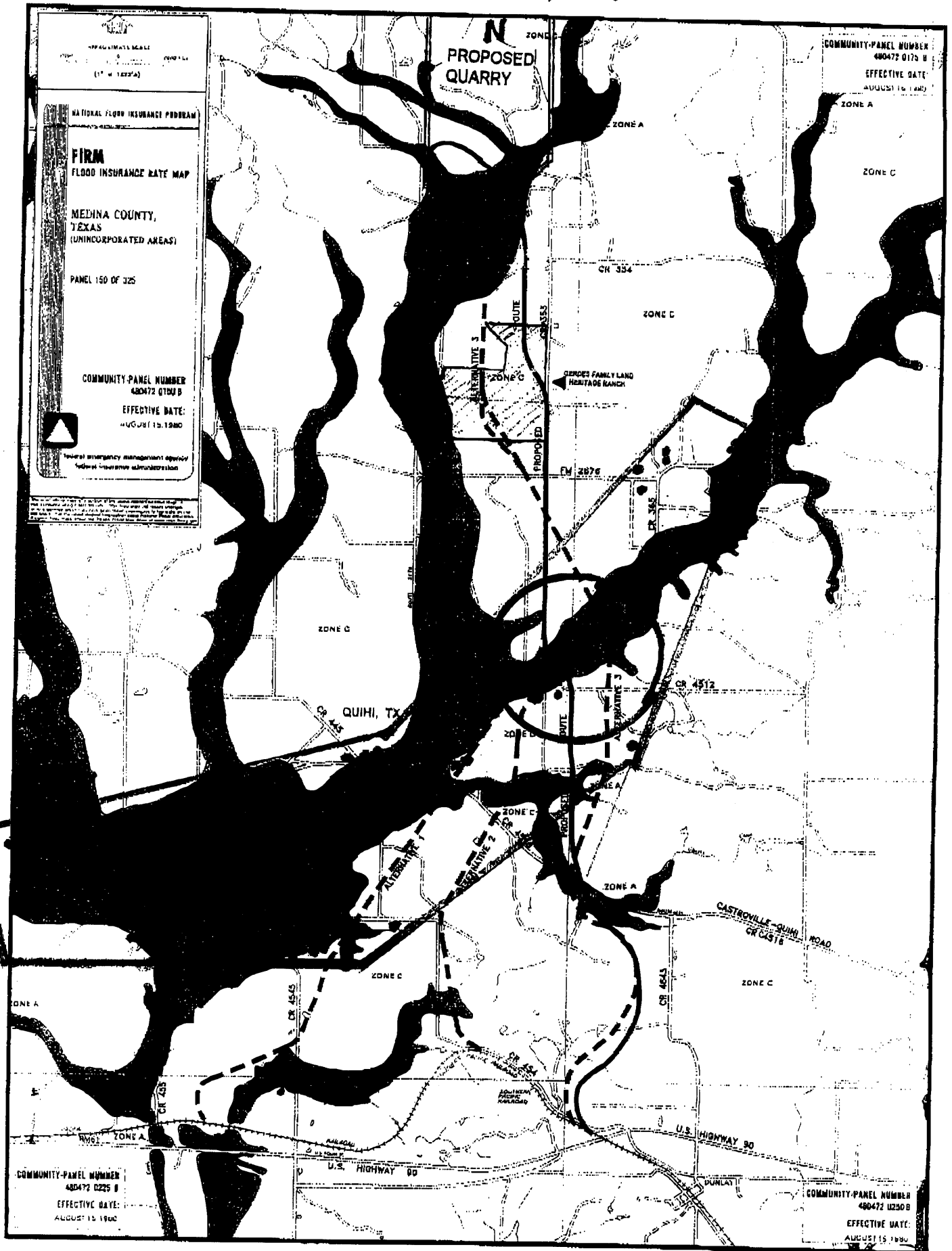

Alyne Meyers Fitzgerald

cc: U.S. Congressman Henry Bonilla
U.S. Senator John Cornyn
Texas Senator Frank Madla
Texas Representative Timoteo Garza
Texas Commissioner of Agriculture, Susan Combs
Texas Department of Transportation, James Randall,
Director, Transportation Planning and Programming,
Medina County Judge Jim Barden
Medina County Commissioner Royce Hartman

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MEDINA COUNTY, Texas



Historical Sites

Floodplain Area

